REMARKS

Applicants acknowledge receipt of the Examiner's Final Office Action dated

September 12, 2006. All claims pending at that time were rejected. In light of the following

remarks, Applicants respectfully request the Examiner's reconsideration and reexamination of all

pending claims.

Claims 1-2, 4-6, 13, 15-18, 20-21, an 24-26 were rejected under 35 U.S.C. § 103 as being

unpatentable over U.S. Patent No. 6, 668,304 issued to Satran et al. ("Satran") and U.S. Patent

No. 7,080,198 issued to Young ("Young"). Independent claim 1 recites:

> A method comprising:
> a computer system generating first and second write
>   transactions;
> wherein the first and second write transactions
>   comprise first and second tags, respectively,
>   wherein each of the first and second tags
>   relate the first write transaction to the
>   second write transaction;
> the computer system transmitting the first and
>   second write transactions to first and second
>   storage devices, respectively;
> wherein the first write transaction comprises data D
>   to be written;
> wherein the second write transaction comprises data
>   D to be written.

The Office Action asserts that column 2, lines 61-63 of Satran discloses claim 1's requirement of

"computer system" generating first and second write transactions. Column 2, lines 61-63 of

Satran recites:

> It is an object of some aspects of the
> present invention to provide an improved system
> for supporting data transactions.

While the foregoing can be interpreted to teach generating first and second data transactions, the foregoing does not the specify type of transactions generated (e.g., write data transactions, read data transactions, or a combination thereof). However, for the purposes of this response, Applicants will presume that column 2, lines 61-63 of Satran teaches generating first and second write transactions.

Claim 1 requires that the first and second write transactions generated by the computer system include first and second tags, respectively, wherein each of the first and second tags relate the first write transaction to the second write transaction. The Office Action asserts these limitations of claim 1 are taught in Satran, column 5, lines 10-11; column 5, lines 66-67, and; column 6, lines 7-8. According to the Office Action, column 5, lines 10-11 teaches "tags indicate which of the data blocks is currently engaged in an open data transaction." The Office Action also asserts that column 5, lines 66-67 teaches "one or more data fields include a tag indicative of a state of the data transaction." Lastly, the Office Action asserts that column 6, lines 7-8 teaches "the data transaction comprises a plurality of concurrent data transactions." As shown below, none of these cited sections of Satran teach or fairly suggest a computer system generating first and second write transactions including first and second tags, respectively, wherein each of the first and second tags relate the first write transaction to the second write transaction

The tags of column 5, lines 10-11 are contained within a translation table which maps the logical block addresses and any respective addresses. This translation table is included in a data structure. The data structure, in turn, is included in volatile memory of control circuitry. See Satran, column 4, line 67 – column 5, line 11. Translation table 72 shown in Fig. 2 of Satran illustrates tags 73 contained therein. Translation table 72 translates between logical block

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addresses (LBA's) and physical block addresses. Translation table 72 also comprises a tag field 73, whereby a tag for each entry TT(i) in the translation table 72 can be set to indicate that block (i) is currently engaged in an open transaction. See Satran, column 11, lines 62 – column 12, line 12. While column 5, lines 10-11 of Satran may teach tags that indicate which of the data blocks is currently engaged in an open transaction, the tags are not included in first and second write transactions generated by computer system as required by independent claim 1. Rather, as shown above, tags of Satran are contained in the translation table, like translation table 72 shown in Fig. 2.

Column 5, lines 66-67 teaches one or more data fields that include a tag indicative of a state of the data transaction. However, column 5, lines 66-67 does not teach that the data fields with the tags are contained within first and second write transactions, let alone that the first and second tags relate the first write transaction to the second write transaction as required by claim 1. Rather, tags disclosed in column 5, lines 66-67 of Satran are part of a trailer written to a succession of data blocks. See column 5, lines 61-67. Satran discloses a trailer 204 comprising a block-type field 210, wherein is stored a tag describing a type of block 200. See Satran, column 14, lines 18-33. Satran describes the trailer 204 as being stored in transactions supporting logical disk 28 (Fig. 1A). Again, while column 5, lines 66-67 teaches tags indicative of a state of a data transaction, the tags are not included in first and second write transactions, nor do the tags in Satran relate the first write transaction to the second write transaction.

Column 6, lines 7-8 teaches a data transaction which comprises a plurality of concurrent data transactions. This cited section of Satran does not teach or fairly suggest tags contained with the first and second write data transactions, let along tags which relate to the first write transaction to the second write transaction. Accordingly, Applicants assert that independent claim 1 is patentably distinguishable over the cited sections of Satran and Young.

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Independent claim 15 recites limitations similar to independent claim 1. Specifically, independent claim 15 recites "wherein the first and second write transactions comprise first and second tags, respectively. The Office Action asserts that column 5, lines 10-11, and 66-67 teach these limitations. Applicants have shown above 1 that column 5, lines 10-11 and 66-67 of Satran do not teach or fairly suggest first and second write transactions comprising first and second tags, respectively. As such, Applicants assert that independent claim 15 is patentably distinguishable over the cited sections of Satran and Young.

Independent claim 17 recites limitations similar to those of independent claims 1 and 15. Specifically, independent claim 17 recites first and second write transactions comprising first and second tags, respectively, wherein each of the first and second tags relate the first write transaction to the second write transaction. The Office Action asserts that these limitations are taught in Satran in column 5, lines 10-11 and 66-67. Applicants have shown that column 5, lines 10-11 and 66-67 of Satran do not teach the aforementioned limitations. Accordingly, Applicants assert that independent claim 17 is patentably distinguishable over the cited sections of Satran and Young.

Independent claim 25 recites generating first and second write transactions wherein the first and second write transactions comprise first and second tags, respectively. The Office Action asserts that these limitations can be found in column 5, lines 10-11 and 66-67. For the reasons set forth above, Applicants assert the cited sections of Satran fails to teach first and second write transactions comprising first and second tags, respectively. As such, Applicants assert that independent claim 25 is patently distinguishable over the cited sections of Satran and Young.

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The remaining claims depend directly or indirectly from independent claims 1 and 17. Insofar as these claims have been shown to be patentably distinguishable over the cited sections of Satran and Young, it follows that the remaining dependent claims are likewise patentably distinguishable.

CONCLUSION

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia, 22313-1450, on October 11, 2006.

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Attorney for Applicants   Date of Signature

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